



CITY OF HOUSTON

Annise D. Parker

Mayor

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April 19, 2012

Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046

Members of the Commission,

On behalf of the City of Houston Office of Emergency Management, I am requesting that the Federal Communications Commission (FCC) reconsider the statement in CFR 47 §11.56(a)(2) regarding exceptions to the ECIG Guidelines and delete the reference to 'using text-to-speech technology.' This will not mandate the use of text-to-speech technology, but allow the use of the technology to be a decision driven by the marketplace, ease the burden on emergency management agencies, and provide a faster, more efficient and more effective tool to alert residents.

Text-to-speech is a technology that is only advancing, and concerns about message clarity in aural form, while important, should not dictate the ability to use this technology in emergency alerting systems. As the IPAWS/CAP program moves forward, the ability for local emergency management organizations to originate messages and broadcast them through limited bandwidth should be considered. Requiring pre-recorded audio file message to be the only way to deliver aural messages through the EAS system places a detrimental burden on local emergency management agencies with limited resources, and has the potential to slow down the time between message origination and dissemination.

In addition, the removal of text-to-speech functionalities from EAS message origination may cause some key life-safety messages to be missed by unattended EAS decoders and transmitters, or the use of only "squawk" tones as a method of alerting (caused by EAS SAME data headers being mis-generated in the IPAWS system originating as a CMAS text-only message). All research in public warning indicates that without a clear understanding of the threat, individuals in a warning area will not take the proper protective action and in fact, may place themselves in harms way to try to ascertain their threat level. The simple use of "squawk" tones without accompanying aural messages will result in undue concern and burden residents to search for additional threat information. This could have a detrimental effect on 911 call centers during such an activation.

The City of Houston Office of Emergency Management, as a key alert originator for the Houston Urban Area, asks that the FCC reconsider the portions of CFR 47 §11.56(a)(2) which would disallow the use of text-to-speech alert origination technology, and asks that a more thorough review of the proposed policy be undertaken with input from local and state emergency management agencies.

Thank you for the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink that reads "Annise D. Parker". The signature is fluid and cursive.

Annise D. Parker